



Solutia Inc.
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May 9, 2003

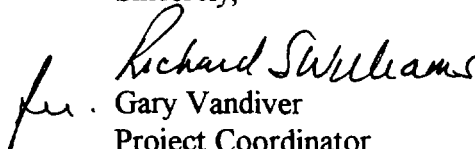
Mr. Nabil S. Fayoumi
U. S. EPA - Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, Illinois 60604-3590

**Re: Sauget Sites Area I - January 21, 1999 Administrative Order by Consent (AOC)
May 2003 Monthly Report**

Dear Mr. Fayoumi,

Enclosed is the May 2003 Monthly Report for Sauget Sites Area I. This submittal is in fulfillment of the monthly requirements of Section 2.4 Reporting, of the January 21, 1999 Final Administrative Order by Consent for Sauget Sites Area I, Sauget and Cahokia, Illinois.

Sincerely,


Gary Vandiver
Project Coordinator
Solutia Inc.

cc: Kevin Turner - USEPA
Tim Gouger - USACE
Sandra Bron - IEPA
Michael L. Henry - IDNR
Dave Webb - IDPH
Mike Coffey - USF&W
Linda Tape - Husch & Eppenberger
Mayor Frank Bergman - Cahokia, IL
Village of Sauget - c/o P. H. Weis & Associates (Attn: Brian Nelson)
Mayor P. Sauget - Sauget, IL
Richard Williams - Solutia



Sauget Sites Area I - Sauget, Illinois

AOC - EECA / RIFS

Monthly Report

Date of Report: May 9, 2003
Period Covered: April 1, 2003 - April 30, 2003
Next Report Period: May 1, 2003 - May 31, 2003

Work Performed during the reporting period

Background

The Sauget Area I consolidated draft EE/CA & RI/FS Report was submitted to the Agencies for review and comment on March 9, 2001. Revision 01 Draft EE/CA & RI/FS Report was submitted to the Agencies on June 8, 2001. The Agencies responded to Revision 01 Draft EE/CA & RI/FS Report on July 17, 2001, requiring additional revisions before approval. Agreement was reached in an August 3, 2001 meeting that the Agencies would further modify and revise the Revision 01 Draft EE/CA & RI/FS Report and return it to Solutia for completion and final issuance. During October 2001, the Draft EE/CA & RI/FS Report was revised by the Agencies. Solutia has commented to the Agencies on the recommended modifications.

Revision 2 of the Draft HHRA - submitted to the Agencies August 31, 2001 - was approved by the Agencies in a November 13, 2001 letter.

April Results

The October 2001 Draft EE/CA & RI/FS Report - along with Solutia's comments on the Agencies' proposed revisions - remained under review by the Agencies.

A revised Draft Ecological Risk Assessment ("ERA"), submitted to the Agencies on June 29, 2001, remained under review.

Responses to comments received from USEPA on the Sauget Area I Dead Creek Final Remedy EE/CA and ERA were submitted to the Agencies on November 12, 2002. These comments have been reviewed by USEPA and a second set of comments has been received from the Agency. During a meeting held on March 24, 2003, Solutia requested a meeting with the various reviewers to discuss the individual comments. USEPA agreed to arrange that meeting in April and agreed to a postponement of the due date for responses to these comments to a date to be established once the meeting is held. That

meeting was held on April 29, 2003 and it was agreed that responses to the comments, based on discussions at the meeting, would be submitted to the Agencies on June 2, 2003.

A second set of comments on the Quality Assurance/Sampling & Analysis Plan (QAPP) for sediment sampling in the Borrow Pit Lake that was submitted to the Agencies on November 14, 2002 was received from the Agency on February 25, 2003. Responses to these comments were submitted on April 8, 2003. The QAPP was approved by USEPA on April 23, 2003.

Comments were received on the DNAPL Investigation Work Plan that was submitted to the Agency on February 28, 2003. Responses to these comments are being prepared and will be submitted to the Agencies on May 13, 2003.

There are no Technical Memoranda attached to this report.

Data Submittal

There are no data submitted in this report.

Work scheduled for next reporting period

- Assist Agencies as requested in completion and issuance of the Final EE/CA & RI/FS Report and ERA.
- Submit responses to the comments on the DNAPL Investigation Work Plan.
- Prepare responses to the comments on the Dead Creek Final Remedy EE/CA and ERA

Problems and Solutions

None

Submittal Schedule Status

See attached schedule - consistent with the approved SSP - as revised where indicated.

Other Issues

None

Comments

None

January 21, 1999 Sauget Area I AOC
SCHEDULE

(03/01 Revision)

- | | |
|--|---|
| 1. Designation of Contractor | Completed 3/10/99 ¹ |
| 2. Designation of Other Contractors | 5 Business Days Before Start of Work |
| 3. Designation of Project Coordinator | Completed |
| 4. Submit Support Sampling Plan (SSP) | Submitted February 22, 1999 |
| 5. Submit Revised SSP | April 8, 1999 ² June 25, 1999 ³ August 13, 1999 ⁴ October 9, 1999⁵ Approval |
| 6. Obtain Access Agreements | July 1, 1999 ⁶ October 17, 1999 ⁷ October 1, 1999 ⁸ |
| 7. Submit Health and Safety Plan (HASP) | Approved October 9, 1999 |
| 8. Submit Quality Assurance and Sampling Plan (QAPP) | Approved October 9, 1999 |

¹ Per March 10, 1999 memo DML to M. McAteer re "Notification of Contractors and Contractor Qualifications"

² Per 3/19/99 e-mail from M. McAteer to M. Light, AOC schedule modified to "21 days after receipt of U. S. EPA comments from the February 22, 1999 SSP submittal". U. S. EPA comments on the 2/22/99 SSP submittal were received 3/19/99. Revised SSP submitted to U. S. EPA April 8, 1999 and disapproved June 3, 1999.

³ April 8, 1999 SSP submittal disapproved June 3, 1999. Revised plan due to the Agency June 25, 1999. Revised plan submitted June 25th as required.

⁴ June 25th SSP submittal disapproved July 16, 1999 and resubmitted August 13, 1999.

⁵ August 13, 1999 SSP submittal as revised August 30, 1999 and October 7, 1999 received final Agency approval on October 9, 1999.

⁶ Per 5/21/99 phone call from M. McAteer to M. Light, AOC schedule modified to "July 1, 1999 with interim report due on June 15, 1999", consistent with Solutia's request in a May 18, 1999 Access report and request for extension.

⁷ Access agreements update issued August 15, 1999 with request to extend deadline to October 17, 1999. Extensions to October 17, 1999 were granted by Mike McAteer in an August 17, 1999 e-mail to Mike Light.

⁸ Access agreements update issued October 17, 1999 with request to extend deadline to October 1, 1999. Extensions to October 1, 1999 was granted by Mike McAteer in a October 21, 1999 e-mail to Mike Light

January 21, 1999 Sauget Area I AOC
SCHEDULE (Cont.)

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|--|--|
| 9. Sampling Notification | 10 Business Days Prior to Start of Work ⁹ |
| 10. Submit Data Report ¹⁰ | 01/09/01¹¹ (Submitted 1/9/01-) Included HH & Eco R/As) |
| 11. Submit EE/CA Report ¹² | 60 Calendar Days After Data Report Submittal - 03/09/01 |
| <ul style="list-style-type: none">• Revised HHR/As• Revised ECO R/A | Approved November 13, 2001 June 29, 2001 Draft under review. |
| 12. Submit Revised EE/CA Report | 21 Calendar Days After Receipt of EPA Comments Revised Report Submittal – 06-08-01 (Submitted 6/8/01) |
| 13. Submit RI/FS Report | 90 Calendar Days After Data Report Submittal - 04/09/01 (Submitted 3/9/01 w/ EECA Report) |
| 14. Submit Revised EE/CA & RI/FS Report | 21 Calendar Days After Receipt of EPA Comments (Submitted March 30, 2001) Revised Report Submittal – 06-08-01 (Submitted 6/8/01) Revised Report Submittal – 08-10-01 (Agreement reached in 08-03-01 meeting – Agency to prepare next draft prior to Solutia's completion) |

⁹ Notification given on August 19, 1999 that Air Sampling will begin on October 7, 1999. Per 9-2-99 phone conversation with Mike McAteer, the 10 day notification requirement can be treated as a "Day 1" requirement only, which has already been met.

¹⁰ The January 9, 2001 Data Report submittal also included the draft Human Health and ECO Risk Assessments.

¹¹ Per SSP - 16 mo. from SSP approval date of 9/9/99.

¹² The March 9 EECA submittal also included the RIFS.

January 21, 1999 Sauget Area I AOC
SCHEDULE (Cont.)

15. Progress Reports

Monthly Beginning February 19,
1999¹³

¹³ Pursuant to decisions in 9-1-99 EPA Kickoff Meeting - Report period for the monthly report will be changed to the calendar month to coincide with project field work - due on the 10th of the month.